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VIA EMAIL & CM/ ECF

U.S. Magistrate Judge Susan K. Gauvey  
U.S. District Court for the  
District of Maryland  
101 W. Lombard Street  
Baltimore, MD 21201

Re: Jubilant Cadista Pharmaceuticals, Inc. v. Epic Pharma, LLC, et al.  
Civil No. 1:12-cv-02089-GLR

Dear Judge Gauvey:

The undersigned represents the Defendants in the above-referenced matter. Pursuant to the telephonic hearing conducted on July 30, 2013 and Your Honor's Order of the same date, Defendants have consulted with their vendors to determine whether it would be possible to meet the new discovery deadline set by this Court for Defendants to produce batches of responsive documents beginning on August 5, 2013 and produce all discovery by August 9, 2013. For the reasons more fully set forth below, Defendants will not be able to fully comply with these new discovery deadlines, but will endeavor to produce an initial batch of responsive documents by August 9, 2013, followed by another production on August 16, 2013.

As Your Honor will recall, following a telephone hearing on June 13, 2013, Judge Russell adopted Defendants' proposed scheduling order over Plaintiffs' objection and directed Defendants to supplement their document production by August 16, 2013. (Dkt. No. 34). As we explained to Judge Russell during the June 13<sup>th</sup> hearing, since being recently substituted as counsel, we had retained a vendor and were engaged in the process of collecting and exporting approximately 700 GB of data from Epic's database, backup tapes, etc. to a searchable platform in order to apply search terms previously agreed upon by counsel for the parties. The application of these search terms initially yielded approximately 100,000 documents (not pages) for review, which was only reduced after the vendor performed further de-duplication. Ultimately, Defendants were left with approximately 50,000 documents to review.<sup>1</sup> The August 16<sup>th</sup> date

<sup>1</sup> Defendants have retained a vendor to perform document review. In addition to a project manager, the vendor has (00635567.DOC;1 )